



NATIONS UNIES
COMMISSION ÉCONOMIQUE
POUR L'EUROPE

ОБЪЕДИНЕННЫЕ НАЦИИ
ЭКОНОМИЧЕСКАЯ КОМИССИЯ
ДЛЯ ЕВРОПЫ

UNITED NATIONS
ECONOMIC COMMISSION
FOR EUROPE

Sustainable Energy Division
Palais des Nations
CH-1211 Geneva 10
Switzerland

Phone: +41-22-917 2444
Fax: +41-22-917 0038
E-mail: Branko.Milicevic@unece.org
Website: www.unece.org/energy/se/cmm

4 April 2014

Ms. Rajinder Sahota
Chief
Cap-and-Trade Program
California Air Resources Board

Dear Ms. Sahota

I am writing on behalf of the United Nations Economic Commission for Europe (ECE) Group of Experts on Coal Mine Methane. Our group of experts convenes as a part of the Sustainable Energy Committee of the ECE. Our work is focused on the sustainable development of coal mine methane (CMM) not only in the ECE, of which the United States of America is a member state, but wherever gassy coal is being mined. In order for the capture and use of coal mine methane to be truly sustainable, development must be strongly rooted in principles of environmental, economic and social sustainability.

While there is more work to be done, our group of experts recognizes that the California Air Resource Board will be taking a valuable step towards sustainable development of coalmine methane resources by adopting the Compliance Offset Protocol for Mine Methane Capture Projects. This is not only an important step for California; it is important for many countries in the world. Methane is a well-mixed gas in the atmosphere and therefore what is done to reduce emissions of this powerful greenhouse gas in one country undeniably benefits other countries. California, by virtue of its ranking as one of the top ten economies in the world, and its location on the coast of the United States, is inextricably connected to the global economy. Even if California's carbon trading scheme is never directly linked to others throughout the world, it will become a positive environmental, economic, and social influence. We are cognizant that some are concerned that the protocol may encourage additional coal production through economic incentives that will be enjoyed by those that reduce emissions of coal mine methane: this is wrongheaded. Any actions that are taken to reduce emissions of coal mine methane in any of its forms provide local and global environmental benefits. Worldwide, coal mine methane is a source of clean burning fuel and contributes to the health and welfare of people that would otherwise not have access to clean energy. Moreover, providing economic incentives to capture and use coal mine methane saves lives. All coal mining nations have suffered the loss of miners to methane related accidents. These accidents are not inevitable—they are preventable. Lack of investment in effective management of coal mine methane at coal mines is the cause of methane emissions to the atmosphere, waste and destruction of important natural resources, and tragically, accidents that lead to the needless loss of life. These accidents occur not only in developing nations, but also in developed nations such as those that occurred in 2010 in the United States and New Zealand.

Members of the Group of Experts on Coal Mine Methane authored a document entitled "Best Practice Guidance for Effective Methane Drainage and Use in Coal Mines"

http://www.unece.org/fileadmin/DAM/energy/se/pdfs/cmm/pub/BestPractGuide_MethDrain_es31.pdf. This document is designed to provide regulators and decision makers a background for principled based actions that if taken, can lead to sustainable development of a resource that is a clean burning fuel if used, or a powerful greenhouse gas if it is vented to the atmosphere. Its capture and utilization positively affects the global environment and that of local communities.

We urge the California Air Resources Board to adopt the proposed protocol which will surely encourage the reduction of emissions of coal mine methane to the atmosphere and contribute to best practices for sustainable energy production.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'Raymond C. Pilcher', with a long horizontal line extending to the right.

Raymond C. Pilcher
Chair
Group of Experts on CMM